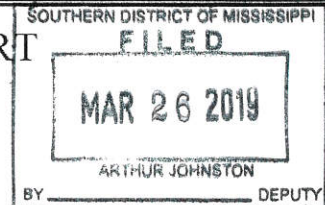


AO 91 (Rev. 11/11) Criminal Complaint

## UNITED STATES DISTRICT COURT

for the

Southern District of Mississippi



United States of America

v.

Vinh Nguyen, Charles Hancock and  
Matthew Stevens

Case No.

1:19 mj 42-JCG

Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 25, 2019 in the county of Harrison in the  
Southern District of MS, Southern Division, the defendant(s) violated:

*Code Section*

21 U.S.C. § 846 and  
 21 U.S.C. § 841(b)(1)(B)

*Offense Description*

Conspiracy to Possess with Intent to Distribute a Controlled Substance, to wit, 100 kilograms or more of a mixture or substance containing a detectable amount of marijuana, a schedule I controlled substance.

This criminal complaint is based on these facts:

See affidavit attached hereto and incorporated herein by reference.

☒ Continued on the attached sheet.

Complainant's signature

Holly Krantz Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date:

3/26/2019

City and state:

Gulfport, MS

Judge's signature

John C. Garofalo U.S. Magistrate Judge

Printed name and title

AFFIDAVIT

STATE OF MISSISSIPPI  
COUNTY OF HARRISON

I, Holly Krantz, being first duly sworn, hereby depose and say that:

1. Affiant, Holly Krantz, is a Special Agent (SA) with Department of Homeland Security, Homeland Security Investigations (HSI), for approximately ten (10) years and is a graduate of the Federal Law Enforcement Training Center. SA Krantz also has approximately ten (10) years of experience as a law enforcement officer with the state of Mississippi working with Picayune Police Department, Gulfport Police Department, and Pearl River Basin Narcotic Task Force. SA Krantz is also a previous graduate of the Southern Regional Public Safety Institute in Long Beach, Mississippi certifying as a state of Mississippi law enforcement officer. SA Krantz is a graduate of The University of Southern Mississippi with a Bachelor of Arts degree majoring in criminal justice. SA Krantz has received training in narcotic investigations and has previously worked numerous narcotic investigations involving the apprehension of drug violators. SA Krantz is currently assigned to the Gulfport Drug Enforcement Administration (DEA)/High Intensity Drug Trafficking Area (HIDTA) Task Force.
2. On March 25, 2019, HSI and DEA agents were conducting surveillance relating to hotel, motel, and parcel interdictions in Harrison County, Mississippi. Agents, acting on a tip, had previously obtained a canine sniff on a U-Pack shipping pod at a shipping freight company on Shriner's Blvd., in Biloxi, Mississippi. The canine positively alerted to a pod in the yard. At approximately 1037 hours, SA Krantz and SA Todd Key observed a Louisiana-plated white Honda Accord, occupied by two white males later identified as

CHARLES HANCOCK and MATTHEW STEVENS, enter the shipping freight company yard. Agents also observed a U-Haul truck, occupied by an Asian male later identified as VINH NGUYEN, enter the business and park directly behind CHARLES HANCOCK and MATTHEW STEVENS just outside the shipping warehouse gate.

3. VINH NGUYEN was observed exiting the U-Haul and entering the shipping warehouse for several minutes. VINH NGUYEN then exited the warehouse, entered the U-Haul and backed it up to a U-Pack container in the shipping yard that had been subject to the canine sniff. CHARLES HANCOCK and MATTHEW STEVENS were observed exiting the Honda Accord outside the shipping yard, at which time they walked into the shipping yard to the U-Pack container and U-Haul driven by VINH NGUYEN. The U-Pack container was opened, and VINH NGUYEN, CHARLES HANCOCK, and MATTHEW STEVENS were observed off-loading cardboard boxes from the U-Pack container into the U-Haul truck.
4. VINH NGUYEN departed the shipping facility driving the U-Haul, while MATTHEW STEVENS and CHARLES HANCOCK departed the shipping facility in the Honda Accord. Both vehicles were observed driving westbound on Interstate 10 in Harrison County, Mississippi.
5. Harrison County Sheriff's Deputy Chris Sexton conducted a traffic stop on the Honda Accord occupied by driver CHARLES HANCOCK and passenger MATTHEW STEVENS on Interstate 10 westbound near mile marker 37. Written consent was given by MATTHEW STEVENS to search the vehicle. During the search, a fannie pack was discovered in the back seat containing a green leafy substance believed to be marijuana, along with a key chain with a U-Haul key. MATTHEW STEVENS was issued a citation



for careless driving. Both occupants denied knowledge of the U-Haul they were traveling with. While officers were speaking with CHARLES HANCOCK and MATTHEW STEVENS, MATTHEW STEVENS deleted and reset his cellphone.

6. Harrison County Deputy Jerry Thomley conducted a traffic stop on the U-Haul driven by VINH NGUYEN on Interstate 10 westbound near mile marker 36. VINH NGUYEN was issued a citation for careless driving. VINH NGUYEN initially denied knowledge of the Honda Accord, but later stated his friends were following him to assist with moving. VINH NGUYEN refused consent to search the U-Haul, which was locked with a pad lock, to which VINH NGUYEN stated he had forgotten the key at home. A Harrison County K9 gave a positive alert on the U-Haul.
7. Agents were able to access the U-Haul with the key located in the Honda Accord. Upon entry of the U-Haul, agents located sixty-seven (67) cardboard boxes containing various forms of marijuana. Upon weighing each item and bagging as evidence the following items and weights were obtained: marijuana vape cartridges approximately 481 kilograms, marijuana cookie cigars approximately 175.6 kilograms, medical cannabis gummy candy approximately 42.4 kilograms, marijuana wax approximately 3.2 kilograms, and marijuana approximately 220.6 kilograms.
8. The U-Haul was rented at a storage facility on Tucker Road in Biloxi, Mississippi. The employee of the storage facility stated three male individuals came in on the morning of March 25, 2019 and rented the U-Haul at 10:20 a.m. The employee further stated there was video surveillance of the three individuals renting the U-Haul. The U-Haul was rented in the name VINH NGUYEN.

9. Based on the aforementioned facts and circumstances, your affiant believes there is probable cause to believe that Vinh NGUYEN, Charles HANCOCK, and Matthew STEVENS have violated Section 846, Title 21, United States Code, conspiracy to possess with intent to distribute 100 kilograms or more of marijuana.



Holly Krantz, Special Agent  
Department of Homeland Security  
Homeland Security Investigations

Sworn and subscribed to me this 26<sup>th</sup> day of March, 2019.



UNITED STATES MAGISTRATE JUDGE